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9 Attorney for Defendant and
10 Counterclaimant Kieu Hanh Trading, Inc.
11 doing business as Kieu Hanh Jewelry
12 (erroneously sued as Kieu Hanh Jewelry)

13 **UNITED STATES DISTRICT COURT**

14 **CENTRAL DISTRICT OF CALIFORNIA (SOUTHERN DIVISION)**

15 **VERRAGIO, LTD.,**

16 **Plaintiff,**

17 **vs.**

18 **KIEU HANH JEWELRY,**

19 **Defendant.**

20 **KIEU HANH TRADING, INC., doing**
21 **business as KIEU HANH JEWELRY,**

22 **Counterclaimant,**

23 **vs.**

24 **VERRAGIO, LTD.,**

25 **Counterclaim Defendant.**

26 **CASE NO.: 8:15-cv-00688-CJC-DFM**

27 **NOTICE OF SETTLEMENT**

1 TO THE COURT:

2 PLEASE TAKE NOTICE, pursuant to Local Rule 16-15.7, that Plaintiff–Counterclaim
3 Defendant Verragio, Ltd. has reached a resolution with Defendant–Counterclaimant Kieu Hanh
4 Trading, Inc., erroneously sued as Kieu Hanh Jewelry in this action. This resolution will resolve
5 this matter in its entirety. The parties are currently working to finalize the settlement agreement
6 relating to this resolution. The parties expect to file a dismissal within twenty-one (21) days.
7 Therefore, the parties respectfully request that the current hearings, dates, and deadlines be
8 vacated so that the parties can finalize performance of the terms of the agreement and file the
9 dismissal.

10 Pursuant to Local Rule 5-4.3.4(a)(2), counsel for Defendant – Counterclaimant attests
11 that counsel for Plaintiff – Counterclaim Defendant concurs in the content of this Notice of
12 Settlement and has authorized its filing with his electronic signature.

13 Dated: March 31, 2016

TUCKER ELLIS LLP

14 By: /s/ Howard A. Kroll
15 Howard Kroll
16 Attorney for Plaintiff and
17 Counterclaim Defendant
Verragio, Ltd.

18 Dated: March 31, 2016

ROZSA LAW GROUP L.C.

19 By: /s/ Thomas I. Rozsa
20 Thomas I. Rozsa
21 Zsafia Nemeth
22 Attorneys for Defendant and Counterclaimant
23 Kieu Hanh Trading, Inc. d/b/a Kieu Hanh Jewelry
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PROOF OF SERVICE

I declare that I am over the age of eighteen (18) years and not a party to this action. My business address is 18757 Burbank Boulevard, Suite 220, Tarzana, California 91356-3346.

On March 31, 16, I have served on the parties or their counsel shown below, the following documents described as:

Howard A. Kroll, Esq. Tucker Ellis LLP 515 South Flower Street Forty-Second Floor Los Angeles, CA 90071-2223 Facsimile: (213) 430-3400 [howard.kroll@tuckerellis.com]	Attorneys for Plaintiff Verragio, Ltd.
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☐ **BY MAIL.** I am readily familiar with the firm's practice of collection and processing of correspondence for mailing with the United States Postal Service. Under that practice the correspondence was deposited with the United States Postal Service on the same day this declaration was executed in the ordinary course of business. Under that practice, the envelope(s) was (were) sealed, and with postage thereon fully prepaid, placed for collection and mailing on this date by first class mail at Tarzana, California addressed as set forth below.

☐ **BY FEDERAL EXPRESS.** I placed the document(s) listed above with fees thereon fully prepaid for deposit with Federal Express (next business day delivery), this same day following ordinary business practices to the address(es) set forth below.

☐ **BY FACSIMILE TRANSMISSION.** I caused the above-referenced document to be transmitted by facsimile to its intended recipient(s) at the following facsimile number:

☒ **BY E-MAIL.** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent to the person(s) at the e-mail address(es) indicated above through the Court's ECF service.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on March 31, 16 at Tarzana, California.

/s/ Zsafia Nemeth
Zsafia Nemeth